

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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In re:

Wisconsin & Milwaukee Hotel LLC,

Case No. 24-21743-gmh  
Chapter 11

Debtor.

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**SEPTEMBER 2024 FEE STATEMENT OF RICHMAN & RICHMAN LLC  
AS COUNSEL TO DEBTOR**

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|---|--|
| Applicant:  | Richman & Richman LLC                        |
| Counsel for:  | Wisconsin & Milwaukee Hotel LLC              |
| Period for compensation and reimbursement:                                    | September 1, 2024 through September 30, 2024 |
| Amount of compensation sought as actual, reasonable, and necessary:           | \$13,589.00                                  |
| Amount of reimbursement expenses sought as actual, reasonable, and necessary: | \$995.70                                     |
| Total interim approval requested:   | <b>\$14,584.70</b>                           |

Dated this 10<sup>th</sup> day of October 2024.

**RICHMAN & RICHMAN  
Attorneys for the Debtor**

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# Richman & Richman LLC

# INVOICE

122 W Washington Ave, Suite 850  
Madison, WI 53703-2732

Invoice # 1049  
Date: 10/10/2024  
Due On: 11/09/2024

Wisconsin & Milwaukee Hotel LLC  
c/o Jackson Street Management LLC  
Attn: Mr. Edward G. Carow  
731 N. Jackson Street, Suite 420, Milwaukee WI53202

## Wisconsin & Milwaukee Hotel LLC/-2024.00023

### Chapter 11

#### Services

| Type    | Date       | Notes  | Timekeeper | Quantity | Rate     | Total    |
|---------|------------|--|------------|----------|----------|----------|
| Service | 09/03/2024 | 1109 - Asset Analysis & Recovery: Review and prepare all documents produced to lender including White Lodging documents, for review of appraiser LWHA (.8); email exchange with T. Goldblatt at LWHA re: documents for review (.1) | DTF        | 0.90     | \$195.00 | \$175.50 |
| Service | 09/03/2024 | 1112 - Debtor Meetings & Communications: Weekly client team mtg, incl. J. Cordova and D. Friedland   | MPR        | 0.70     | \$750.00 | \$525.00 |
| Service | 09/03/2024 | 1104 - DIP Financing / Cash Collateral: zoom meeting w/D. Friedland and J. Cordova re budget questions   | MPR        | 0.20     | \$750.00 | \$150.00 |
| Service | 09/03/2024 | 1102 - Case Administration / US Trustee: review query from V. Morelli re increased AP and AR in April, and prep of response after emails w/J. Cordova and D. Friedland   | MPR        | 0.20     | \$750.00 | \$150.00 |
| Service | 09/03/2024 | 1108 - Employment, Billing & Compensation: work on Sikich employment app   | MPR        | 0.10     | \$750.00 | \$75.00  |
| Service | 09/04/2024 | 1108 - Employment, Billing & Compensation: Work on Sikich employment app (.3); email w/J. Cordova re Sikich questions (.1)   | MPR        | 0.40     | \$750.00 | \$300.00 |
| Service | 09/04/2024 | 1108 - Employment, Billing & Compensation: Prepare revisions to current drafts of Application to Employ Sikich as Accountant for WMH and Declaration of  | EMR        | 0.80     | \$450.00 | \$360.00 |

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|   |            |   |     |      |          |          |
|---|------------|---|-----|------|----------|----------|
| Gerald Schmit in support of same (.7);<br>prepare email to Jennifer Maldonado<br>forwarding same for her review (.1). |            |   |     |      |          |          |
| Service   | 09/05/2024 | 1108 - Employment, Billing & Compensation: Prepare email to Jennifer Cordova and Erin Horman at Sikich providing Application to Employ Sikich pleadings for review and signatures for filing.   | EMR | 0.30 | \$450.00 | \$135.00 |
| Service   | 09/05/2024 | 1108 - Employment, Billing & Compensation: Continue preparing application to employ ICAP as financial advisor/auditor.  | EMR | 0.70 | \$450.00 | \$315.00 |
| Service   | 09/05/2024 | 1108 - Employment, Billing & Compensation: Prepare proposed order granting Application to Employ LWHA as appraiser for WMH.   | EMR | 0.50 | \$450.00 | \$225.00 |
| Service   | 09/05/2024 | 1109 - Asset Analysis & Recovery: Emails w/D. Friedland re scope of asset mgmt. work to be done   | MPR | 0.10 | \$750.00 | \$75.00  |
| Service   | 09/06/2024 | 1108 - Employment, Billing & Compensation: Finalize application to employ Sikich LLC as accountants with declaration and exhibits and prepare for court filing  | DTF | 0.40 | \$195.00 | \$78.00  |
| Service   | 09/06/2024 | 1108 - Employment, Billing & Compensation: Prepare preliminary draft of August 2024 monthly invoice statement pursuant to alternative compensation procedures order   | DTF | 0.20 | \$195.00 | \$39.00  |
| Service   | 09/06/2024 | 1108 - Employment, Billing & Compensation: Prep of email to J. Jaeger re court approval and related email to WL re payment expected   | MPR | 0.10 | \$750.00 | \$75.00  |
| Service   | 09/06/2024 | 1108 - Employment, Billing & Compensation: Finalize Application to Employ Sikich LLC as accountants for WMH, including receiving and reviewing email from Erin Horman at Sikich regarding revisions to Application and revised versions (.4); phone conference with Erin Horman to discuss revisions (.2); and receiving and reviewing final version of Declaration for filing with Application (.2). | EMR | 0.80 | \$450.00 | \$360.00 |
| Service   | 09/09/2024 | 1108 - Employment, Billing & Compensation: Revise and update draft August 2024 R&R monthly invoice statement pursuant to alternative  | DTF | 0.20 | \$195.00 | \$39.00  |

|  |            |  |     |      |          |          |
|--|------------|--|-----|------|----------|----------|
| compensation procedures order (.1); prepare draft proposed order of August 2024 monthly invoice statement (.1) |            |  |     |      |          |          |
| Service  | 09/09/2024 | 1108 - Employment, Billing & Compensation: Continue preparing Application to Employ ICAP Development LLC as accountant for WMH (.5); prepare email to MPR and Jennifer Cordova forwarding same for their review (.1) | EMR | 0.60 | \$450.00 | \$270.00 |
| Service  | 09/10/2024 | 1108 - Employment, Billing & Compensation: Finalize August 2024 R&R monthly fee statement with invoice and prepare for court filing  | DTF | 0.20 | \$195.00 | \$39.00  |
| Service  | 09/10/2024 | 1109 - Asset Analysis & Recovery: Prepare sharefile of documents produced to lenders for review of additional LWHA appraiser   | DTF | 0.20 | \$195.00 | \$39.00  |
| Service  | 09/10/2024 | 1108 - Employment, Billing & Compensation: Continue review of file and invoices and revise and update draft first interim fee application  | DTF | 1.80 | \$195.00 | \$351.00 |
| Service  | 09/10/2024 | 1110 - Claim Management Issues: Prepare Objection to Proof of Claims.  | YXC | 3.00 | \$195.00 | \$585.00 |
| Service  | 09/11/2024 | 1108 - Employment, Billing & Compensation: Continue review of all invoices and draft first interim R&R fee application with preparation of exhibits  | DTF | 3.80 | \$195.00 | \$741.00 |
| Service  | 09/11/2024 | 1110 - Claim Management Issues: Prepare Objection to Proof of Claims.  | YXC | 6.00 | \$0.00   | \$0.00   |
| Service  | 09/11/2024 | 1108 - Employment, Billing & Compensation: Work on app to employ ICAP Development, and dec in support  | MPR | 0.30 | \$750.00 | \$225.00 |
| Service  | 09/11/2024 | 1112 - Debtor Meetings & Communications: prep of agenda for team strategy call on 9/12/24  | MPR | 0.10 | \$750.00 | \$75.00  |
| Service  | 09/11/2024 | 1108 - Employment, Billing & Compensation: Continue preparing Application to Employ ICAP Development LLC as accountant to WMH.   | EMR | 0.80 | \$450.00 | \$360.00 |
| Service  | 09/12/2024 | 1108 - Employment, Billing & Compensation: Continue drafting first interim R&R fee application with preparation of exhibits  | DTF | 2.80 | \$195.00 | \$546.00 |
| Service  | 09/12/2024 | 1112 - Debtor Meetings & Communications: Team status/strategy meeting by Zoom  | MPR | 0.30 | \$750.00 | \$225.00 |

|         |            |   |     |      |          |          |
|---------|------------|---|-----|------|----------|----------|
| Service | 09/12/2024 | 1108 - Employment, Billing & Compensation: Prepare email to Shaun Geracie and Jennifer Maldonado forwarding final versions of Application to Employ ICAP Development LLC as accountant for WMH (.2); conduct email exchange with Shaun Geracie to address his questions regarding the Application and Declaration to file same (.3); conduct email exchange with Shaun Geracie and Jennifer Cordova to confirm ICAP's fee (.2). | EMR | 0.70 | \$450.00 | \$315.00 |
| Service | 09/13/2024 | 1109 - Asset Analysis & Recovery: Review email from LWHA appraiser with request for additional documents and information, and review file for all available documentation responsive to request (.6); email exchange and review with client re: information and available documentation (.2); prepare all documentation and provide detailed information via email and sharefile link to appraiser (.7)                         | DTF | 1.50 | \$195.00 | \$292.50 |
| Service | 09/13/2024 | 1110 - Claim Management Issues: Review emails between J Cordova and YXC to ascertain claims filed by Mariott, and review filed claims to confirm objections   | CAR | 0.40 | \$575.00 | \$230.00 |
| Service | 09/13/2024 | 1108 - Employment, Billing & Compensation: Prepare email to Shaun Geracie and Jennifer Cordova advising of filing of Application to Employ ICAP Development and effect of same.   | EMR | 0.10 | \$450.00 | \$45.00  |
| Service | 09/13/2024 | 1110 - Claim Management Issues: Review and revise draft of proposed email to Jennifer Cordova requesting information on White Lodging's proof of claim.   | EMR | 0.20 | \$450.00 | \$90.00  |
| Service | 09/18/2024 | 1108 - Employment, Billing & Compensation: Prepare itemization of expenses for the fee period and additional review of supporting documents for exhibits in support of finalizing first interim fee application   | DTF | 0.70 | \$195.00 | \$136.50 |
| Service | 09/18/2024 | 1109 - Asset Analysis & Recovery: Review client's email with updated monthly star report for review of LWHA appraiser and provide updated documentation to appraiser via email  | DTF | 0.20 | \$195.00 | \$39.00  |
| Service | 09/18/2024 | 1110 - Claim Management Issues: Prepare objection to proof of claim.  | YXC | 3.30 | \$0.00   | \$0.00   |
| Service | 09/18/2024 | 1108 - Employment, Billing & Compensation: Work on first interim fee  | MPR | 0.30 | \$750.00 | \$225.00 |

| app     |            |   |     |      |          |            |
|---------|------------|---|-----|------|----------|------------|
| Service | 09/18/2024 | 1104 - DIP Financing / Cash Collateral: prep of email to F. DiCastri re emergency replacement of broken window shades and purchase of furniture for dining room | MPR | 0.10 | \$750.00 | \$75.00    |
| Service | 09/18/2024 | 1108 - Employment, Billing & Compensation: Prepare revisions to draft of Richman & Richman LLC's first interim fee application.                                 | EMR | 3.50 | \$450.00 | \$1,575.00 |
| Service | 09/18/2024 | 1108 - Employment, Billing & Compensation: Continue preparing Richman & Richman LLC's first interim fee application.  | EMR | 0.80 | \$450.00 | \$360.00   |
| Service | 09/19/2024 | 1108 - Employment, Billing & Compensation: Prepare proposed order granting Application to Employ Sikich LLC as accountants for WMH.                             | EMR | 0.40 | \$450.00 | \$180.00   |
| Service | 09/20/2024 | 1108 - Employment, Billing & Compensation: Prepare proposed order approving Richman & Richman LLC's monthly fee request for August 2024.                        | EMR | 0.20 | \$450.00 | \$90.00    |
| Service | 09/20/2024 | 1108 - Employment, Billing & Compensation: Continue preparing Richman & Richman's first interim fee application.  | EMR | 1.00 | \$450.00 | \$450.00   |
| Service | 09/23/2024 | 1103 - Petition, Schedules & Financials: Finalize August 2024 monthly operating report with supporting documentation for court filing                           | DTF | 0.30 | \$195.00 | \$58.50    |
| Service | 09/23/2024 | 1102 - Case Administration / US Trustee: Conduct review of August 2024 MOR to finalize same.  | EMR | 0.20 | \$450.00 | \$90.00    |
| Service | 09/24/2024 | 1112 - Debtor Meetings & Communications: prep of agenda for team zoom mtg (.1);team strategy/zoom meeting (.5)  | MPR | 0.60 | \$750.00 | \$450.00   |
| Service | 09/24/2024 | 1104 - DIP Financing / Cash Collateral: prep of email to F. DiCastri re budget and emergency repairs  | MPR | 0.10 | \$750.00 | \$75.00    |
| Service | 09/25/2024 | 1104 - DIP Financing / Cash Collateral: email exchanges w/F. DiCastri re Lender Qs about MOR distribution reports and other pending matters                     | MPR | 0.10 | \$750.00 | \$75.00    |
| Service | 09/26/2024 | 1108 - Employment, Billing & Compensation: Review proposed engagement agreement between Lennhoff  | EMR | 1.00 | \$450.00 | \$450.00   |

Real Estate Consulting and WMH (.2); phone conference with David Lennhoff to discuss employment process (.2); prepare email to David Lennhoff providing information for conflicts check (.2); begin preparing Application to Employ Lennhoff Real Estate Consulting (.4).

|         |            |   |                          |      |                    |          |
|---------|------------|---|--------------------------|------|--------------------|----------|
| Service | 09/26/2024 | 1108 - Employment, Billing & Compensation: Continue preparing Richman & Richman LLC's first interim fee application.  | EMR                      | 1.50 | \$450.00           | \$675.00 |
| Service | 09/27/2024 | 1108 - Employment, Billing & Compensation: Conduct email exchange with David Lennhoff regarding results of his conflict check for purposes of Application to Employ Lennhoff Real Estate Consulting as appraiser/expert witness for WMH.  | EMR                      | 0.20 | \$450.00           | \$90.00  |
| Service | 09/30/2024 | 1108 - Employment, Billing & Compensation: Conduct email exchange with Jennifer Cordova and Shaun Geracie for ICAP advising of status of Application, including no objections filed as to same (.2); prepare proposed order granting Application to Employ ICAP Development LLC as Accountant for WMH (.5). | EMR                      | 0.70 | \$450.00           | \$315.00 |
| Service | 09/30/2024 | 1108 - Employment, Billing & Compensation: Prepare Application to Employ Lennhoff Real Estate Consulting LLC as expert witness for WMH and Declaration of David Lennhoff in support of Application (1.4); prepare email to Attorneys Karnes, Strohbehn, and Richman forwarding same for their review (.1).  | EMR                      | 1.50 | \$450.00           | \$675.00 |
|         |            |   | <b>Quantity Subtotal</b> |      | <b>46.1</b>        |          |
|         |            |   | <b>Services Subtotal</b> |      | <b>\$13,589.00</b> |          |

## Expenses

| Type    | Date       | Notes   | Quantity | Rate     | Total    |
|---------|------------|---|----------|----------|----------|
| Expense | 08/14/2024 | Copy Expense: Stretto Printing/Copying Expense: Application of the Debtor for Authority to Retain and Employ LW Hospitality Advisors as Appraiser (Doc 224) and Notice of Application of the Debtor for Authority to Retain and Employ LW Hospitality Advisors as Appraiser (Doc 225) | 1.00     | \$727.65 | \$727.65 |
| Expense | 08/14/2024 | Postage Expense: Stretto Postage Expense: Application of the Debtor for Authority to Retain and Employ LW Hospitality Advisors as Appraiser (Doc 224)   | 1.00     | \$268.05 | \$268.05 |

and Notice of Application of the Debtor for Authority to  
Retain and Employ LW Hospitality Advisors as  
Appraiser (Doc 225)

|                    |                 |                 | <b>Expenses Subtotal</b> | <b>\$995.70</b>    |
|--------------------|-----------------|-----------------|--------------------------|--------------------|
| <b>Time Keeper</b> | <b>Position</b> | <b>Quantity</b> | <b>Rate</b>              | <b>Total</b>       |
| Eliza Reyes        | Associate       | 16.5            | \$450.00                 | \$7,425.00         |
| Claire Richman     | Partner         | 0.4             | \$575.00                 | \$230.00           |
| Michael Richman    | Partner         | 3.7             | \$750.00                 | \$2,775.00         |
| Yabing Chong       | Law Clerk       | 3.0             | \$195.00                 | \$585.00           |
| Yabing Chong       | Law Clerk       | 9.3             | \$0.00                   | \$0.00             |
| David Fowle        | Paralegal       | 13.2            | \$195.00                 | \$2,574.00         |
|                    |                 |                 | <b>Quantity Total</b>    | <b>46.1</b>        |
|                    |                 |                 | <b>Subtotal</b>          | <b>\$14,584.70</b> |
|                    |                 |                 | <b>Total</b>             | <b>\$14,584.70</b> |